REMARKS

Claims 1-22 were pending and examined. Claims 1-22 have been rejected by the Examiner under 35 U.S.C. §103. No claims are objected to and no claims are allowed. The rejection of Claims 1-22 has been made final.

By this Amendment and Reply, it is proposed to amend Claims 3, 16 and 17, no claims are proposed to be cancelled or added. Accordingly, Claims 1-22 remain pending for further examination. Entry of the above-described amendment and favorable reconsideration of this application in light of the following discussion is requested.

Claim Objection:

At Section 4 of the Office Action the Examiner objects to the limitation "wherein said clustering of KID within said standardized scheme is adapted to particular needs ..." alleging that the limitation "is indirect, suggests optionally, and passive which renders any claimed [subject matter] after not be given patentable weight." See Office Action at page 3.

While Applicants respectfully disagree with this characterization, it is proposed to amend Claim 17 to remove the clause "adapted to particular needs" and replace with a term further reciting the inventive storage paradigm. Support for the proposed amendment may be found in the original disclosure at least at page 11, subparagraph number (2) of paragraph [0025] of the Specification as filed, as well as paragraph [0047] of the Specification as published. Thus, no new matter is added.

In view thereof, the Examiner is respectfully requested to enter the proposed amendment, and to reconsider and remove the objection of Claim 17.

Claim Rejection:

At Sections 5 and 6 of the Office Action the Examiner rejects Claim 18 under 35 U.S.C. §112, first paragraph, alleging that the claim fails to comply with the written description requirement. Specifically, the Examiner asserts that the limitations of Claim 18 are "not described in the Specification in such a way as to reasonably convey to one skilled in the art that the inventor(s), at the time the application was filed, had possession of the claimed invention." See Office Action at page 3.

Applicants respectfully disagree with this assertion and respectfully direct the Examiner's attention to the original disclosure and, in particular, to a section of the Specification entitled "Rules of Operation" at page 16, paragraph [0033] to page 19, paragraph [0048] of the Specification as filed, as well as paragraphs [0070] to [0085] of the Specification as published. Specifically, and for the convenience of the Examiner, each recited limitation of Claim 18 is cross-referenced to Applicants' "Rule" numbering system in the Specification as filed and as published in the chart below.

Claim limitation	Rule Number	Paragraph of Spec as Filed	Paragraph of Spec as Published
maintaining a minimum number of electronic storage locations by eliminating software ...	Rule 1	[0034]	[0071]
implementing a minimum number of total electronic and physical ...	Rule 2	[0035]	[0072]
using said priority based scheme of said plurality of logical partitions ...	Rule 3	[0036]	[0073]
using a general subset for segregating KID that properly references ...	Rule 4	[0037]	[0074]
naming all KID so as to include at least a date and content information...	Rule 5	[0038]	[0075]
employing a numerical indication of priority within a selected subset ...	Rule 6	[0039]	[0076]
maximizing exposure to guides, maps and labels itemizing contents of ...	Rule 7	[0040]	[0077]
when one subset of said plurality of logical partitions exceeds ...	Rule 8	[0041]	[0078]
consistently labeling UKIDS levels and subsets to reflect contents of ...	Rule 13	[0046]	[0083]

establishing guidelines for duration of KID storage in physical UKIDS ...	Rule 14	[0047]	[0084]
naming subset KID storage categories to describe content and context ...	Rule 15	[0048]	[0085]

As is recited in independent Claim 1, the present invention teaches "... rules defin[ing] methods for allocating KID within one of said plurality of logical partitions, for purging KID from said UKIDS, and for efficiently sharing and distributing KID between said receivers." Claim 18 further defines the rules (e.g., Rules 1-8, and 13-15 as highlighted above) for allocating KID, as are recited in the instant Specification.

In view thereof, the Examiner is respectfully requested to reconsider and remove the objection of Claim 18 under 35 U.S.C. §112, first paragraph.

Moreover, at Sections 7 and 8 of the Office Action the Examiner rejects Claim 3 under 35 U.S.C. §112, second paragraph, alleging that Claim 3 is indefinite as a recited limitation lacks antecedent basis. It is proposed to amend Claim 3 with the Examiner's comment in mind. No new matter is added.

Accordingly, the Examiner is respectfully requested to enter the proposed amendment, and to reconsider and remove the rejection of Claim 3.

Prior Art Rejections:

At Sections 9 and 10 of the Office Action the Examiner rejects Claims 1-17 and 22 under 35 U.S.C. §103(a) as allegedly being unpatentable over Chu (U.S. Patent Publication No. 2003/0065663A1) in view of Kemp (U.S. Patent Publication No. 2004/0024775A1). These rejections are respectfully disagreed with, and are traversed below.

As previously noted, Chu is merely seen to disclose a computer-implemented data interface to a knowledge repository and, in particular, an interface (client application 40) for an end user 32 to formulate a request (via a query XML module 42) to retrieve a model stored in one of the knowledge repositories (remotely located repositories 34 and 36). See Chu at paragraphs [0014]-[0016]. As such, Chu is merely seen to disclose a conventional search

engine-type query interface of remotely located data stores and, more particularly, an interface for a repository including a model repository 300 and a data mining application 318 for searching volumes of data stored therein.

With reference to Chu at paragraphs [0018} and [0022] at page 6, first and second full paragraphs of the Office Action, the Examiner appears to assert that Chu's XML request handling module or APIs provide the recited "rules and tools for configuring said UKIDS and for storing and accessing KID included therein" as recited in independent Claims 1, 16 and 22. However, it is respectfully submitted that as a search engine-type query interface Chu merely discloses processes (e.g., the XML request handling module and APIs) for querying and retrieving (e.g., merely a tool for accessing) information from remotely located data stores. See, for example, Chu at paragraph [0023], which recites how APIs are executed to provide search results. As such, and contrary to the Examiner's statement, Chu is not seen to disclose or suggest "an interface ... providing a plurality of logical partitions for segregating and storing said KID in a priority-based and standardized scheme within said UKIDS, .. and further providing rules and tools for configuring said UKIDS and for storing and accessing KID included therein," as is recited in independent Claims 1, 16 and 22.

Further, the Examiner states in the paragraph spanning pages 6 and 7 of the Office Action, that Chu fails to teach a first level of logical partitions that segregates KID storage into specific personal and professional levels. The Examiner turns to Kemp and proposes combination of the teachings of Chu and Kemp to cure this deficiency, noting that Kemp discloses that "it is advantageous to break down information within a given field into a number of analytical topics, such as those listed herein as examples within the legal field...". See Office Action at page 7, first full paragraph.

However, it is respectfully submitted that the present invention teaches and claims a universal system for storing knowledge, information and data in a data store (e.g., the recited UKIDS) within a plurality of logical partitions having levels reflecting a priority-based and standardized scheme applicable to all aspects of personal and professional KID. As such, the present invention does not teach merely breaking down information within a given field or industry into a number of analytical topics, as is disclosed in Kemp.

For example, Kemp is merely seen to disclose a system for fulfilling request from users wanting current information related to legal or other topics designated by users from lists of available topics. See Kemp at the Abstract. At paragraphs [0039]-[0042], Kemp merely discloses broadcasting current awareness information from one or more information sources 170 by a provider system 101 broadcasting such information to one or more requesting users 150. Information is assigned an identification code, label or tag (by manual or automated means) classifying the information by type or class within a topic. Kemp further discloses specific topics and sub-topics within a particular business field, namely, the legal field.

Accordingly, and as previously argued, Kemp is merely seen to disclose one of a number of conventional information management systems discussed in the Background Section of the instant application with reference to FIGS. 1 and 2, where data or information is stored in, what the instant application deems, counter intuitive, industry specific data structures. For example, and as noted in the instant application, systems that merely classify data and information in one of a number of broadly defined, analytical topics of importance only within a particular industry (e.g., "securities law", "contract law", "real estate law", and the like, within the legal profession), are not effective systems for storing information as such systems ultimately require detailed methods of locating and retrieving such information (e.g., requiring query functions), and contribute to what the present application describes as "information overload." That is, merely separating data and information purely by broad analytical topics having relevancy only within a subject industry (e.g., the aforementioned legal subject matter categories) still yields, over time, a large collection of data and information related only in that the data and information may reference one of the broad subject matter categories.

Therefore, even if the teachings of Chu and Kemp are somehow combined as the Examiner suggest, a point that Applicant does not admit is suggested, the proposed combination would still not describe or suggest the subject matter of the present invention as is recited in the claims.

For example, the proposed combination of Chu and Kemp is merely seen to disclose a conventional search engine-type query interface (e.g., accessing tools) for searching remotely located data stores (Chu), and wherein data and information in the repository is stored within one of a number of broadly defined, analytical topics of import to a specific industry, and wherein

when stored, the data and information may be assigned an identification code, label or tag (by manual or automated means) classifying the information by a type or class within one of the analytical topics (Kemp).

As argued above, neither Chu nor Kemp alone or in the proposed combination, disclose, teach or suggest a system for storing knowledge, information or data (KID) in a universal knowledge, information and data store (UKIDS) and an interface providing a plurality of logical partitions for segregating and storing KID, and where the logical partitions include at least a first level of the logical partitions for segregating KID storage into personal and professional levels, the system having rules and tools for configuring said UKIDS and for storing and accessing KID included therein, as is recited in the instant independent Claims 1, 16 and 22.

Accordingly, it is respectfully submitted that even if the teachings of Chu and Kemp were combined (which is not admitted is suggest), the resulting combination would still not teach or suggest the present invention as is claimed in independent Claims 1, 16 and 22.

In view of the foregoing, it is respectfully submitted that Chu and Kemp, either alone or in the Examiner's proposed combination, are not seen to either expressly teach or suggest the subject matter of the independent claims as now presented. In that the independent claims are patentable over the prior art of record, the dependent claims must also be found patentable.

Moreover, in a Response to Arguments Section at page 37, Section 2 of the Office Action, the Examiner states that Applicants' argument that the recited partitions of KID are universal and thus, not arbitrary or relevant to only one industry, is not recited in independent Claims 1 and 16. However, Applicants note that Claims 1, 16 and 22 each recite "a plurality of sources of KID" and "a universal knowledge, information and data store (UKIDS)" and that such limitations must be interpreted as broadly as their terms reasonably allow. In re American Academy of Science Tech Center, 367 F.3d 1359, 1369, 70 USPQ2d 1827, 1834 (Fed. Cir. 2004), MPEP §2111.01. While Applicants' representative acknowledges that it is improper to import claim limitations from the Specification during Examination, as is noted by the Examiner, the words of the claim must be given their plain meaning and, as such, a plurality of logical partitions for segregating and storing KID in a priority-based and standardized scheme within a universal knowledge, information and data store (UKIDS), must be interpreted as pertaining to more than more industry.

Accordingly, the Examiner is respectfully requested to reconsider and to withdraw the rejection of Claims 1-17 and 22 under 35 U.S.C. §103(a) as allegedly being unpatentable over Chu in view of Kemp.

At Section 11 of the Office Action the Examiner rejects Claim 18 under 35 U.S.C. §103(a) as allegedly being unpatentable over Chu in view of Kemp, and further in view of Multer (U.S. Patent Publication No. 2002/0040369A1). This rejection is respectfully disagreed with, and is traversed below.

The deficiency in the application of the proposed combination of Chu and Kemp as applied to Claim 1 is outlined above.

In Section 11 the Examiner states that the proposed combination of Chu and Kemp does not explicitly teach the rules for allocating KID as is recited in Claim 18. To cure this deficiency, the Examiner proposes combination with Multer.

Multer is merely seen to disclose a binary data synchronization engine for, in essence, applying a "change log" detailing changes made to data files on one system and applying the changes to a data store containing data identical to the data files. See Multer at the Abstract. Such systems and devices are commonly used for synchronizing data including both documents and personal information between personal computing devices.

The Examiner refers to Multer at paragraphs [0191] and [0236] as disclosing limitations including use of universal record formats for synchronizing files without regard to individual vendor application information formats, and for providing a streaming format that allows processing by a device engine with minimal storage and memory configuration. See the Office Action at page 31.

It is respectfully submitted however, that even if Multer is seen to disclose these recited limitations, it is not seen how the Examiner purports to apply the proposed combination of references to the limitations of Claim 18, which recites specific rules for allocating KID within a data store. That is, the referenced paragraphs of Multer do little more that express a binary synchronization approach and a goal of minimizing storage and memory configurations, no where does the reference expressly or implicitly disclose or suggest the limitations of Claim 18.

For example, the proposed combination of Chu Kemp, and Multer are not seen to disclose or suggest, inter alia:

> "... maintaining a minimum number of electronic storage locations by eliminating software application default storage locations;
> implementing a minimum number of total electronic and physical storage locations;
> using said priority based scheme of said plurality of logical partitions to dictate an appropriate storage level for KID that could be placed in more than one level and subset within said levels;
> using a general subset for segregating KID that properly references more than one of subset of said logical partitions;
> naming all KID so as to include at least a date and content information in a title thereof;
> employing a numerical indication of priority within a selected subset when said selected subset contains a relatively large number of KID
> maximizing exposure to guides, maps and labels itemizing contents of said logical partitions to highlight pathways for locating KID;
> when one subset of said plurality of logical partitions exceeds a predetermined number of KID storage items, re-organizing said subset through sub-categorization;
> consistently labeling UKIDS levels and subsets to reflect contents of said logical partitions;
> establishing guidelines for duration of KID storage in physical UKIDS storage means; and
> naming subset KID storage categories to describe content and context of the KID being stored therein" as is recited in Claim 18.

In view of the foregoing, it is respectfully submitted that the proposed combination of Chu, Kemp, and Multer are not seen to either expressly teach or suggest the subject matter of the Claim 18. Accordingly, the Examiner is respectfully requested to reconsider and to withdraw the rejection of Claim 18 under 35 U.S.C. §103(a) as allegedly being unpatentable over Chu in view of Kemp, and further in view of Multer.

At Section 12 of the Office Action the Examiner rejects Claim 19 under 35 U.S.C. §103(a) as allegedly being unpatentable over Chu in view of Kemp, and further in view of Harrow et al. (U.S. Patent Publication No. 2003/0009518A1). This rejection is respectfully disagreed with, and is traversed below.

The deficiency in the application of the proposed combination of Chu and Kemp as applied to Claim 1 is outlined above.

In Section 12 the Examiner states that the proposed combination of Chu and Kemp does not explicitly teach a purge policy as is recited in Claim 19. To cure this deficiency, the Examiner proposes combination with Harrow et al.

Harrow et al. disclose a method and apparatus for peer-to-peer services. At paragraph [0075], as the Examiner notes, Harrow et al. disclose purging of content in a Peer-to-Peer System based upon expiry date of a file or in response to an agent program. While purging of data may be known, the express limitations of Claim 19 are not disclosed or suggest. Moreover, the disclosure of Harrow et al. is not seen to cure the aforementioned deficiencies in the application of Chu and Kemp to independent Claim 1, from which Claim 19 depends.

Since independent Claim 1 is deemed patentable over the proposed combination of Chu in view of Kemp, and further in view of Harrow et al., Claim 19 is also deemed patentable. Accordingly, the Examiner is respectfully requested to reconsider and to withdraw the rejection of Claim 19 under 35 U.S.C. §103(a) as allegedly being unpatentable over Chu in view of Kemp, and further in view of Harrow et al.

At Section 13 of the Office Action the Examiner rejects Claim 20 under 35 U.S.C. §103(a) as allegedly being unpatentable over Chu in view of Kemp, and further in view of Francis et al. (U.S. Patent Publication No. 2003/0101153A1). This rejection is respectfully disagreed with, and is traversed below.

The deficiency in the application of the proposed combination of Chu and Kemp as applied to Claim 1 is outlined above.

In Section 13 the Examiner states that the proposed combination of Chu and Kemp does not explicitly teach a policy regarding knowledge to be retained with a leaving employee as is recited in Claim 20. To cure this deficiency, the Examiner proposes combination with Francis et al.

Francis et al. disclose a method of assembling a knowledge database containing question and answer pairs. At paragraph [0162], as the Examiner notes, Francis et al. disclose personal knowledge bases which contain all questions asked by an individual to be retained in a

personalized database where the access code to the questions and their corresponding answers are retained.

However, Claim 20 recites providing personal information to a leaving employee, backing up the information and purging the information from the business resource (e.g., the UKIDS). Even if Chu, Kemp, and Francis et al. were combined as is suggested by the Examiner, the proposed combination is still not seen to disclose the recited limitation. That is, rather than retaining alleged personal knowledge as is disclosed in Francis et al., Claim 20 discloses purging the information from the business resource (e.g., the UKIDS).

As such, it is respectfully submitted that the proposed combination of Chu, Kemp, and Francis et al. are not seen to either expressly teach or suggest the subject matter of the Claim 20. Accordingly, the Examiner is respectfully requested to reconsider and to withdraw the rejection of Claim 20 under 35 U.S.C. §103(a) as allegedly being unpatentable over Chu in view of Kemp, and further in view of Francis et al.

At Section 14 of the Office Action the Examiner rejects Claim 21 under 35 U.S.C. §103(a) as allegedly being unpatentable over Chu in view of Kemp, and further in view of Manohar et al. (U.S. Patent Publication No. 2002/0002571A1). This rejection is respectfully disagreed with, and is traversed below.

The deficiency in the application of the proposed combination of Chu and Kemp as applied to Claim 1 is outlined above.

In Section 14 the Examiner states that the proposed combination of Chu and Kemp does not explicitly teach rules for sharing and distributing KID prior to when an employee leaves a position as is recited in Claim 21. To cure this deficiency, the Examiner proposes combination with Manohar et al.

Manohar et al. disclose an intelligent web browsing system that dynamically adapts a tour based on collected route information, touring statistics, or similarity to one or more like-minded users. At paragraph [0105], as the Examiner notes, Manohar et al. disclose that "tours can also be used as an artifact for exchanging viewpoints between users. For example, users could construct tours to represent viewpoints, and rather than exchange URLs, they could exchange tour handles. Such would be of use for facilitating distance learning."

However, Claim 21 recites that a leaving employee may provide successor employee a personal tour of their respective logical partitions within the UKIDS to identify important KID, identifying to a recipient receiver (e.g., the successor) a targeted location for storing the KID within one of their logical partitions, and for employing quantity reduction and content quality improvement goals for reducing a volume of distributed KID. As such, even if Chu, Kemp, and Manohar et al. were combined as is suggested by the Examiner, the proposed combination is still not seen to disclose the limitations recited in Claim 21.

As such, it is respectfully submitted that the proposed combination of Chu, Kemp, and Manohar et al. are not seen to either expressly teach or suggest the subject matter of the Claim 21. Accordingly, the Examiner is respectfully requested to reconsider and to withdraw the rejection of Claim 21 under 35 U.S.C. §103(a) as allegedly being unpatentable over Chu in view of Kemp, and further in view of Manohar et al.

Additional Proposed Amendments:

Applicants also note that clarifying amendment is proposed to independent Claim 16, to remove an ambiguous reference to a recited storage subset and to conform the claim to similar limitations recited in independent Claim 1. Support for the proposed amendment may be found in the original disclosure. Thus, no new matter was added.

Applicants believe that the foregoing amendments and remarks are fully responsive to the Office Action and the claims are allowable over the references applied by the Examiner. Applicants respectfully request that the Examiner reconsider the present application, remove the outstanding rejections, and allow the application to issue.

Applicants have made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited. To expedite prosecution of this application to allowance, the Examiner is invited to call the undersigned attorney to discuss any issues relating to this application.

No fee is believed due with the filing of this Amendment and Reply. However, if an additional fee is due, Applicants authorize the payment of any additional charges that may be

necessary to maintain the pendency of the present application to the undersigned attorney's Deposit Account No. 50-3342.

Respectfully submitted,
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